

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: TRACY NEAL ROBINSON
Debtor**

**CHAPTER 11
CASE NO. 22-02414-KMS**

**FIRST APPLICATION FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF NECESSARY EXPENSES
FOR THE LAW OFFICES OF CRAIG M. GENO, PLLC**

COMES NOW the Law Offices of Craig M. Geno, PLLC (the “Applicant”), and files this its *First Application for Allowance of Compensation and Reimbursement of Necessary Expenses for the Law Offices of Craig M. Geno, PLLC* (the “Application”), and in support thereof would show unto the Court the following, to-wit:

1. On November 16, 2022, the Debtor herein filed with this Court its original Voluntary Petition under Chapter 11 of the Bankruptcy Code.
2. An Order [DK #41] authorizing the employment of the Law Offices of Craig M. Geno, PLLC as counsel for the Debtor was entered on December 21, 2022.
3. The substantial services rendered to the Debtor and the expenses incurred by Applicant benefitted the estate. An Affidavit reflecting said legal services rendered and expenses incurred is attached hereto as **Exhibit “A”**. The Affidavit also certifies and represents to the Court that the services rendered to the Debtor were reasonable and necessary and that said services have actually been rendered. A detailed itemization of such services and expenses is attached as **Exhibit “B”** and incorporated by reference.
4. The fees and expenses charged and incurred represent reasonable and necessary fees and expenses that were required to be extended by Applicant to the Debtor in all matters which are anticipated to arise in the functioning of litigation matters, case administration and to protect and preserve all rights of the Debtor and the interests of creditors in furtherance of the counsel’s

obligations herein; and they represent normal and customary fees and expenses incurred and charged for representation of debtors in similar cases. The time, skill and experience utilized by counsel for the Debtor justify the approval of the Application.

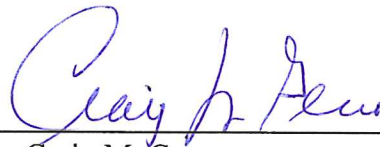
5. This is the Applicant's first request for allowance of compensation for professional services rendered in this proceeding. This request covers the period from September 28, 2022, to and including April 8, 2023, and is for the sum of \$19,144.28 (\$17,226.25 in fees and \$1,918.03 in expenses), less any retainer balance remaining.

WHEREFORE, PREMISES CONSIDERED, Applicant requests that this Court enter an Order awarding reasonable attorneys' fees for the professional services rendered herein, and authorizing and directing the Debtor to pay said attorneys' fees and expenses. Applicant prays for general relief.

THIS, the 13th day of April, 2023.

Respectfully submitted,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793
LAW OFFICES OF CRAIG M. GENO, PLLC
587 Highland Colony Parkway
Ridgeland, MS 39157
601-427-0048 - Telephone
601-427-0050 - Facsimile
cmgeno@cmgenolaw.com

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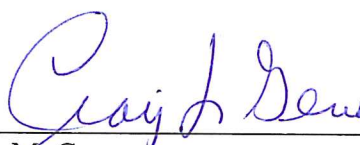
CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing instrument to the following:

Christopher J. Steiskal, Esq.
christopher.j.steiskal@usdoj.gov

Kimberly D. Strong
Subchapter V Trustee
kstrong@hrkcpa.com

THIS, the 13th day of April, 2023.



Craig M. Geno

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: TRACY NEAL ROBINSON
Debtor**

**CHAPTER 11
CASE NO. 22-02414-KMS**

EXHIBIT “A”

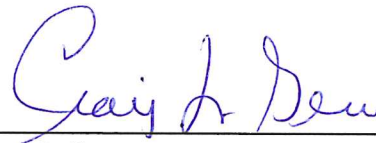
IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: TRACY NEAL ROBINSON
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AFFIDAVIT

PERSONALLY APPEARED BEFORE ME, the undersigned authority, in and for the jurisdiction aforesaid, Craig M. Geno, one of the attorneys for the Debtor, who after having been first by me duly sworn, stated on oath that this Affidavit is submitted in support of the *First Application for Allowance of Compensation and Reimbursement of Necessary Expenses for the Law Offices of Craig M. Geno, PLLC* (the "Application"), Debtor's counsel, that the statements which are attached to the Application as Exhibit "B" represent a detailed statement of reasonable fees and expenses. Affiant hereby makes application for payment of reasonable attorney's fees and necessary expenses.



Craig M. Geno

STATE OF MISSISSIPPI
COUNTY OF MADISON

SWORN TO AND SUBSCRIBED BEFORE ME, this the 13th day of April, 2023.





NOTARY PUBLIC

MY COMMISSION EXPIRES June 21, 2025

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: TRACY NEAL ROBINSON
Debtor**

**CHAPTER 11
CASE NO. 22-02414-KMS**

EXHIBIT “B”

Law Offices of Craig M. Geno, PLLC
 587 Highland Colony Parkway
 Ridgeland, MS-Mississippi 39157 USA

Ph:601-427-0048

Fax:601-427-0050

Tracy Robinson
 540 SCR 88
 Mize, MS-Mississippi
 39116 USA

April 13, 2023

Attention:

File #: 322024

Inv #: 347792

RE: Chapter 11 - SubV

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Sep-28-22	Assisted CMG with drafting, editing letter to David Callen from Community Bank regarding Tracy Neal Robinson's loan status	0.30	55.50	CCL
Oct-04-22	Review memos to/from David Callen rejecting offer of settlement	0.20	80.00	CMG
	Dictation of letter to Mr. Robinson regarding requirements for filing bankruptcy	0.20	80.00	CMG
Oct-05-22	Assisted CMG with drafting and revising letter to Mr. Robinson regarding bank rejection and bankruptcy information	0.30	55.50	CCL
Nov-07-22	Assist CMG drafting New Client Data Sheet, setting up file	0.40	80.00	KLC
Nov-11-22	Assist CMG drafting matrix	0.10	20.00	KLC
Nov-14-22	Review credit counseling certificate, initial papers; Review memo from KLC regarding execution of initial papers to file bankruptcy	0.20	80.00	CMG
	Review memo from KLC regarding foreclosure date	0.10	40.00	CMG
	Assist CMG drafting Petition, Matrix, Schedules D, E/F	0.20	40.00	KLC

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Nov-16-22	Final review and revision of initial papers to be filed	0.10	40.00	CMG
	Review petition confirmation	0.10	40.00	CMG
	Telephone conference (2) with Mr. Robinson confirming case filing and to provide notice to bank of case filing	0.20	80.00	CMG
Nov-17-22	Review various deficiency notices	0.25	100.00	CMG
	Review assignment of case administrator	0.15	60.00	CMG
Nov-21-22	Review memos to/from Chris Steiskal regarding 341 setting	0.15	60.00	CMG
	Review order regarding taxes	0.20	80.00	CMG
	Receipt and review of order re taxes; Calendar deadline to open tax account and notify UST	0.10	20.00	KLC
	Receipt and review of Notice of Deficiency; Calendar deadline to file Schedules, SOFA, Attorney Disclosure Statement	0.10	20.00	KLC
	Receipt and review of Notice of Deficiency; Calendar deadline to file small business documents	0.10	20.00	KLC
	Receipt and review of Notice of Deficiency; Calendar deadline to file List of 20 Largest Unsecured Creditors	0.10	20.00	KLC
	Assist CMG drafting Small Business Documents Affidavit, List of 20 Largest Unsecured Creditors, IDI documents; Draft email to Tracy Robinson re documents due and deadlines to file them	0.45	90.00	KLC
Nov-22-22	Review memo to client regarding affidavit that needs to be filed	0.20	80.00	CMG
	Review order appointing Trustee	0.15	60.00	CMG
	Review 341 notice	0.20	80.00	CMG
	Receipt and review of Notice of 1188(a) Status Conference; Calendar deadline to file and	0.15	30.00	KLC

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	serve status report and hearing date to trigger preparation of hearing folder			
	Receipt and review of Notice of Meeting of Creditors; Calendar various deadlines and hearing date to trigger preparation of hearing folder	0.20	40.00	KLC
Nov-23-22	Review notice of 11 USC Section 1188(a) Status Conference	0.20	80.00	CMG
	Dictation of Application and Order to Employ the Law Offices of Craig M. Geno	0.65	260.00	CMG
	Review and revise Application and Order to Employ the Law Offices of Craig M. Geno	0.25	100.00	CMG
	Dictation of notice regarding Application to Employ	0.20	80.00	CMG
	Dictation of Certificate of Service regarding Application to Employ	0.15	60.00	CMG
	Dictation of 2016(b) Statement	0.10	40.00	CMG
	Assist CMG drafting Attorney Disclosure Statement, Application to Employ CMG, Notice, Certificate of Service and Order re same	0.15	30.00	KLC
	Organize and supervise mailout of Application to Employ CMG	0.20	40.00	KLC
Nov-26-22	Review memos to/from Temekia Edwards regarding dates for Initial Debtor Interview	0.20	80.00	CMG
Nov-28-22	Review memos to/from KLC regarding urgent need to comply with document transmissions and filings	0.20	80.00	CMG
	Review affidavit of lack of business documents	0.10	40.00	CMG
Nov-29-22	Review tax returns	0.20	80.00	CMG
	Assist CMG redacting 2021 tax return and prepare it for filing	0.15	30.00	KLC
Dec-01-22	Dictation of motion/order regarding schedules; Review and revise same	0.55	220.00	CMG

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	Review numerous memos to/from UST, Kim Strong regarding reschedule of IDI	0.25	100.00	CMG
	Telephone conference with Mr. Robinson regarding IDI Materials, checking account and creditors meeting	0.20	80.00	CMG
	Assist CMG drafting Motion to Extend Time to File Schedules, etc. and Order re same	0.10	20.00	KLC
Dec-02-22	Review memos to/from Cathryn Leal regarding signatory authority on Mother's banking account, documents needed for initial debtor interview	0.15	60.00	CMG
Dec-03-22	Review memo from client; Review draft IDI document	0.40	160.00	CMG
	Dictation of memo to UST regarding IDI document	0.15	60.00	CMG
	Dictation of memo to client regarding need to clean up Initial IDI documents	0.15	60.00	CMG
	Review One Main Financial proof of claim	0.45	180.00	CMG
	Review memos to/from Mr. Robinson regarding cash flow projection	0.20	80.00	CMG
Dec-05-22	Review numerous memos to/from Temekia Edwards, Kim Strong regarding new IDI date	0.30	120.00	CMG
	Telephone conference with client regarding aborted IDI and reset IDI; need to establish new DIP account	0.15	60.00	CMG
	Review memos to/from KLC regarding IDI materials and secured claim on vehicle	0.15	60.00	CMG
	Receipt and review of Order on Motion for Additional Time to File Required Documents; Calendar deadline to file Schedules, SOFA, Statement of Current Monthly Income	0.10	20.00	KLC
	Receipt and review of letter from UST scheduling IDI; Calendar hearing date and deadline to submit IDI documents to UST to trigger preparation of hearing folder	0.15	30.00	KLC
Dec-06-22	Draft email to Tracy Robinson re upcoming deadlines and documents to be completed	0.25	50.00	KLC

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Dec-07-22	Review email on schedules/SOFA info regarding preferences and listening/adding secured debt	0.20	80.00	CMG
	Assist CMG drafting SOFA	0.20	40.00	KLC
Dec-08-22	Review memos to/from Katie Carter, Temekia Edwards regarding signature card, depreciation schedule and related issues	0.20	80.00	CMG
	Review memo to/from client regarding post-petition asset sales and payment of creditor claims	0.20	80.00	CMG
	Review memo from KLC; Review revised IDI document; Review bank signature card	0.35	140.00	CMG
	Review and prepare IDI documents for production to UST	0.25	50.00	KLC
Dec-09-22	Review memos to/from Mr. Robinson regarding retention of truck, payment of truck, retention of trailer and secured status of trailer	0.25	100.00	CMG
Dec-12-22	Telephone conference with Mr. Robinson reminding him of IDI	0.10	40.00	CMG
	Attended IDI	0.40	160.00	CMG
	Review memo from UST regarding IDI deficiencies	0.20	80.00	CMG
	Review IDI submissions and need to follow up with additional documents and related matters	0.20	80.00	CMG
	Review memos to/from Chris Steiskal, client regarding photo identification and social security number and card	0.20	80.00	CMG
	Receipt and review of email from Temekia Edwards with UST's office re IDI; Calendar deadline to cure deficiencies and file monthly operating reports	0.10	20.00	KLC
Dec-13-22	Review memos to/from KLC regarding finalizing schedules and numerous unanswered questions that need to be responded to promptly by Mr. Robinson	0.30	120.00	CMG
	Final review and revision of schedules; Review additional drafts of schedules	2.00	800.00	CMG

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	Telephone conference with Mr. Robinson, KLC regarding finalizing schedules	0.25	100.00	CMG
	Subsequent telephone conference with KLC regarding Mr. Robinson's exemptions	0.25	100.00	CMG
	Assist CMG drafting and revising Schedules, Statement of CMI	0.90	180.00	KLC
Dec-14-22	Assist CMG revising schedules	0.30	60.00	KLC
Dec-16-22	Review memos to/from Chris Steiskal; Review and comment on scheduling order	0.30	120.00	CMG
	Review deficiency notice	0.20	80.00	CMG
Dec-20-22	Attended 341	0.75	300.00	CMG
	Dictation of notice of amendment to creditors adding creditors to matrix	0.20	80.00	CMG
	Dictation of Certificate of Service regarding amendments to creditor list	0.10	40.00	CMG
	Dictation of Verification of Creditor Matrix - Amended	0.05	20.00	CMG
	Review minutes from Meeting of Creditors	0.20	80.00	CMG
	Review memo from KLC regarding deficiencies from 341	0.15	60.00	CMG
	Receipt and review of Amended Minutes from Meeting of Creditors; Calendar deadline to cure deficiencies	0.10	20.00	KLC
	Assist CMG drafting Amended Matrix, Notice of Amendment to Matrix and Certificate of Service re same	0.30	60.00	KLC
Dec-21-22	Assist CMG with draft and revision of 1188(c) Status Report	0.40	74.00	CCL
	Organize and supervise mailout of Notice of Amendment to Matrix	0.20	40.00	KLC
	Assist CMG drafting Certificate of Service re 1188(c) Status Report	0.10	20.00	KLC

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Dec-22-22	Processed mailout of 11 U.S.C 1188c Status Report	0.20	37.00	CCL
Dec-23-22	Review filed scheduling order	0.15	60.00	CMG
Dec-26-22	Review extensive memos to/from KLC re values on schedules, deposits of money, tools of the trade or simply tools, mortgage amortization and indebtedness and numerous related matters	0.75	300.00	CMG
Jan-03-23	Assist CMG drafting Amended SOFA, Amended Schedule A/B	0.35	70.00	KLC
Jan-04-23	Review memos to/from Chris Steiskal re curing of 341 deficiencies	0.15	60.00	CMG
	Receipt and review of Order Resetting 1188(a) Status Conference; Calendar hearing date deadline to trigger preparation of hearing folder	0.10	20.00	KLC
	Receipt and review of hearing notice re UST's Objection to SubV Designation; Calendar objection deadline	0.10	20.00	KLC
Jan-05-23	Assist CMG drafting Amended Schedule C and Notice re same	0.20	40.00	KLC
	Assist CMG reviewing and preparing November 2022 MOR for filing	0.15	30.00	KLC
Jan-06-23	Organize and supervise mailout of Notice of Amendment to Schedule C	0.20	40.00	KLC
Jan-09-23	Review notice from Community Bank	0.10	40.00	CMG
Jan-10-23	Review memos to/from client, KLC regarding timing of payment of various administrative and priority claims	0.15	60.00	CMG
Jan-23-23	Review monthly operating report; Review memos to/from Mr. Robinson regarding length of time that monthly operating reports would need to be filed and prepared	0.35	140.00	CMG
Jan-27-23	Assist CMG drafting and revising Amended Attachment V from IDI documents	0.30	60.00	KLC

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Jan-30-23	Review memos to/from Chris Steiskal regarding continuance of hearing	0.20	80.00	CMG
	Review memos to/from Mr. Robinson regarding continuance of hearing	0.15	60.00	CMG
	Receipt and review of reset hearing notice re UST's Objection to Debtor's SubV Designation; Calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	30.00	KLC
Feb-02-23	Review memos to/from Client regarding continuance of hearing as related to plan due date	0.20	80.00	CMG
Feb-07-23	Assist CMG drafting SubV Plan outline, Certificate of Service re same, Ballot and Ballot Summary	0.30	60.00	KLC
Feb-13-23	Review file; Review schedules; Review status report and past history	0.65	260.00	CMG
	Dictation of Plan of Reorganization	1.85	740.00	CMG
Feb-14-23	Review and revision of initial draft of the Plan of Reorganization	1.00	400.00	CMG
	Review and approve monthly operating report	0.35	140.00	CMG
	Assist CMG drafting and revising SubV Plan and prepare exhibits for same	1.05	210.00	KLC
Feb-15-23	Receipt and review of Order Fixing Time re SubV Plan; Calendar various deadlines and hearing date to trigger preparation of hearing folder	0.20	40.00	KLC
	Receipt and review of Clerk's letter re service of Order Fixing Time re SubV Plan; Calendar deadline to file ballot summary	0.10	20.00	KLC
	Assist CMG drafting Certificate of Service re SubV Plan	0.10	20.00	KLC
Feb-16-23	Review memos to/from KLC, UST regarding status of closed accounts and DIP account	0.20	80.00	CMG
	Review large proof of claim from Community Bank	0.65	260.00	CMG

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	Review Hearing Notice on Plan	0.20	80.00	CMG
	Review letter from Clerk regarding notice on Plan	0.15	60.00	CMG
	Dictation of Certificate of Service regarding Plan and Hearing Notice	0.15	60.00	CMG
	Review Community Bank Proof of Claim; Search for equipment description in Security Agreement; Review Proof of Claim for perfection of security interest in mobile home	0.75	300.00	CMG
	Organize and supervise mailout of SubV Plan	0.20	40.00	KLC
Feb-26-23	Review memo from client regarding closing account	0.15	60.00	CMG
Mar-01-23	Review U.S. Trustee's objection to Subchapter V designation	1.00	400.00	CMG
	Review and study case law on eligibilty to file Subchapter V when the Debtor is not operating a business	2.00	800.00	CMG
	Dictation of initial drafts in response to U.S. Trustee's objection to Subchapter V status	1.25	500.00	CMG
Mar-02-23	Review and revision of answer and response to objection to Subchapter V status	1.50	600.00	CMG
	Telephone conference with Kim Strong regarding case status	0.10	40.00	CMG
	Assist CMG with drafting and revising analysis of case authority for response pleading	0.75	138.75	CCL
	Assist CMG drafting and revising Answer and Response to UST's Objection to SubV Designation	1.05	210.00	KLC
Mar-08-23	Telephone conference with Mr. Robinson regarding his testimony for hearing	0.30	120.00	CMG
	Review file and court docket re: 3/9/23 hearing on UST's Objection to SubV Designation; Prepare hearing folder for same	0.25	50.00	KLC
Mar-09-23	Travel to Hattiesburg, MS	0.50	200.00	CMG

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	Conference with client; Attended dismissal hearing	1.25	500.00	CMG
	Travel to Jackson, MS	0.50	200.00	CMG
Mar-10-23	Review order resetting confirmation hearing	0.20	80.00	CMG
	Assist CMG with review and revision of itemizations	0.30	55.50	CCL
	Receipt and review of Order Resetting Hearing re SubV Plan; Calendar hearing date to trigger preparation of hearing folder	0.10	20.00	KLC
Mar-13-23	Review February 2023 monthly operating report	0.30	120.00	CMG
Mar-14-23	Update/preparation of document management control (subfiles and pleadings)	0.90	180.00	KLC
Mar-16-23	Review file; Dictation of application for compensation, notice and COS	1.35	540.00	CMG
Mar-17-23	Review and revise application and itemizations	0.40	160.00	CMG
Apr-01-23	Review Community Bank objection to Plan	0.45	180.00	CMG
Apr-06-23	Review items that need to be sold	0.20	80.00	CMG
	Dictation of sale motion	0.75	300.00	CMG
	Dictation of notice on sale motion	0.20	80.00	CMG
	Dictation of certificate of service for sale motion	0.15	60.00	CMG
	Review and revision of sale motion, notice and COS	0.45	180.00	CMG
	Review memos to/from Chris Steiskal re conditions, reservations in final order on sale of tractor	0.20	80.00	CMG
Apr-08-23	Review memos to/from Michael West (interested purchaser in tractor); Dictation of memo to Mr. Robinson re interested purchaser and instructions to contact	0.25	100.00	CMG

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Totals	49.90	\$17,226.25
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DISBURSEMENTS

Nov-16-22	Long Distance	3.00
Nov-18-22	COURTS/USBC-MS-S	1,738.00
Nov-23-22	Photocopies 32 @ \$.25/page re mailout	8.00
	Postage 3 @ \$.57 re mailout	1.71
Dec-01-22	Long Distance	2.00
Dec-12-22	Long Distance	2.13
Dec-13-22	Long Distance	3.00
Dec-21-22	Photocopies 36 @ \$.25/page re mailout	9.00
	Postage 1 @ \$.57 re mailout	0.57
	Postage 5 @ \$.57 re mailout	2.85
Jan-06-23	Photocopies 18 @ \$.25/page re mailout	4.50
	Postage 5 @ \$.57 re mailout	2.85
Jan-20-23	COURTS/USBC-MS-S	32.00
Feb-16-23	Photocopies 95 @ \$.25/page re mailout	23.75
	Postage 4 @ \$1.98 re mailout	7.92
Mar-08-23	Long Distance	3.13
Mar-09-23	Mileage - 98 Miles @ \$.655/mile	64.19
Mar-23-23	Meals 03-09-23 Robinson	3.78
Apr-06-23	Photocopies 13 @ \$.25/page re mailout	3.25
	Postage 4 @ \$.60 re mailout	2.40
Totals		\$1,918.03

Total Fee & Disbursements	\$19,144.28
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SUMMARY BY TIMEKEEPER

TIMEKEEPER	RATE	HOURS	AMOUNT
Craig M. Geno	\$400.00	36.40	\$14,560.00
Cathryn Leal	\$185.00	2.25	\$416.25
Kathryn L. Carter	\$200.00	11.25	\$2,250.00

TAX ID Number 45-4013160